E-filed 7/16/07

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12 Attorneys for Plaintiff
   IP SOLUTIONS, INC.
13

14   UNITED STATES DISTRICT COURT

15   NORTHERN DISTRICT OF CALIFORNIA

16   (SAN JOSE DIVISION)

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18 IP SOLUTIONS, INC., a Delaware   Case No. 07-CV-2774 (JF)
   corporation,
19   **STIPULATION AND [PROPOSED] ORDER
                 Plaintiff,   EXTENDING TIME IN WHICH
20   DEFENDANTS MAY RESPOND TO
          v.   PLAINTIFF'S COMPLAINT**
21
   BANK OF AMERICA, N.A., a National
22 Banking Association Member; BANK OF
   AMERICA TECHNOLOGY AND
23 OPERATIONS, INC., a Delaware
   corporation,
24
25   Defendants.
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27   TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' ATTORNEYS OF

28 RECORD:

1   IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, IP SOLUTIONS,

2 INC. ("Plaintiff"), and Defendants, BANK OF AMERICA, N.A. and BANK OF AMERICA

3 TECHNOLOGY AND OPERATIONS, INC. ("Defendants"), that Defendants be granted an

4 additional fifteen (15) days in which to respond to Plaintiff's Complaint in the above-captioned

5 matter.

6   Based on this Stipulation and [Proposed] Order, the date by which Defendants must respond

7 to Plaintiff's Complaint shall be extended to Friday, July 27, 2007.

8   IT IS FURTHER HEREBY STIPULATED AND AGREED by and between Plaintiff and

9 Defendants that the time period for noticing a motion filed in response to the Complaint for hearing

10 pursuant to Local Rule 7-2 shall be extended to forty-two (42) days after service of the motion.

11   This Stipulation is not entered into for purposes of delay, and will not alter the date of any

12 event or any deadline already fixed by Court order. By entering into this stipulation, neither

13 Plaintiffs nor Defendants waive any rights, claims or defenses they may have in this action.

14   The Stipulation may be executed in counterparts and by facsimile signature, each of which,

15 when executed, shall be an original and all of which together shall constitute one and the same

16 stipulation. This Stipulation contains the entire agreement among the parties. The undersigned

17 hereby consent to the terms set forth in the foregoing Stipulation.

18   IT IS SO STIPULATED AND AGREED.

19 Dated: July 9, 2007   FISH & RICHARDSON P.C.

20

21   By: /s/ David J. Miclean
                                                     David J. Miclean

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                                                 Attorneys for Defendants
23   BANK OF AMERICA, N.A. and BANK OF
                                                 AMERICA TECHNOLOGY AND
24   OPERATIONS, INC.

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STIPULATION & [PROPOSED] ORDER EXTENDING TIME FOR
DEFS. TO RESPOND TO PLS.' COMPLAINT
Case No. 07-CV-2774 (JF)

1   Dated: July 9, 2007   TRIAL AND TECHNOLOGY LAW GROUP

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4   By: /s/ Robert A. Spanner
                                                Robert A. Spanner

5   Attorney for Plaintiff
                                            IP SOLUTIONS, INC.

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8   PURSUANT TO STIPULATION, IT IS SO ORDERED.

9

10   Dated: __ 7/16/07 _____,2007   _____

11   HONORABLE JEREMY FOGEL
                                            JUDGE OF THE UNITED STATES DISTRICT COURT

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STIPULATION & [PROPOSED] ORDER EXTENDING TIME FOR
DEFS. TO RESPOND TO PLS.' COMPLAINT
Case No. 07-CV-2774 (JF)